



Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Department of Environmental Management

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Dear Commission Member,

Enclosed is a copy of comments I sent on behalf of the Commission to E.P.A. on the Draft RAMP. They include all the comments I received from Commission members.

Sincerely yours,

Diane Hoffmann

DH:vt.

Enclosure

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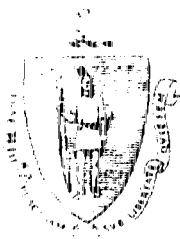
WASTE RESPONSE &
COMPLIANCE BRANCH

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WASTE RESPONSE &
COMPLIANCE BRANCH



*Executive Office of Environmental Affairs
Department of Environmental Management
Bureau of Solid Waste Disposal
Leverett Saltonstall Building, Government Center
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M E M O R A N D U M

TO: Gerry Sotolongo, Environmental Protection Agency
FROM: Diane Hoffmann, Acushnet River Estuary PCB Commission
RE: Comments on New Bedford Remedial Action Master Plan
DATE: February 24, 1983

Overall, the RAMP appears to hit most of the appropriate points and it provides a useful description of how all the pieces of the remedial action program will fit together. As a document to be read by government agency personnel it is largely adequate, as a report to be distributed to the general public to help them understand what is going on it has some weaknesses. My comments below address these specific weaknesses but in general there are two big gaps that should be included:

- (1) a more comprehensive discussion of Superfund, what it is and how it is administered
- (2) an explanation of what is being done about potential health effects and who is carrying out the health investigations and what will be opportunities for public comment. (I realize this does not come under EPA's domain, but it is of utmost concern to the general public and some description of what's happening in the health area is essential).

Specific comments

p.2 - some statement of why heavy metals are a problem should be included.

p.38 - sentence at bottom page is not complete.

APPENDICES

p A-13 - Work Statement 010 - Investigation of Potential Disposal Sites - should include some discussion of applicability of MGL Ch. 21D - The Hazardous Waste Facility Siting Act to location of disposal site for highly contaminated PCB sediment. Although it is mentioned in work statement 011 it could have significant impact on site selection and should be mentioned in Section 010.

pp A-41, 42 - names and telephone numbers of contact persons in each agency would be useful.

p. A-50 - include statement of when community relations program draft will be completed.

p. A-52 - in list of what implementation plan will address include "site selection for dredge material".

At end of Appendix A a summary page with total costs of work orders outlined would be helpful.

- p.5 - (last paragraph) Some discussion of "lead agency" should precede its use in this section. The term is used throughout the initial pages without explanation until p.9)
- p.7 - between 1.4.3 and 1.4.4 should include a section called Plan Selection with discussion of how selection will be made - who is responsible, public comment, considerations, etc.
- p.9 - para. 3 - clarify 50-50/9-10 federal/state division. It has been reported in local news that state must provide 50% of cleanup costs. It is necessary to clarify when each division applies and which will apply in New Bedford case.
- p.9 - last para. - Acushnet River Estuary PCB Commission was established by Governor Edward King under Executive Order #216.
- p.9 - include name and telephone # of contact people for each committee
- p.10 and throughout - Woods Hole should be Woods Hole Oceanographic Institution
- p.11 - not clear why DEM is included, unless because of hazardous waste facility siting role(?)
- p.13 - for most readers, not clear what is meant by "parameter value" or "individual data field" - an example would help
- pp. 16-17 - headings to separate topics would help reader: SEDIMENTS, WATER COLUMN, MARINE LIFE
- p.17 - EPA criteria for salt water environments - not clearly stated what criteria means
- p.19 - (last para) what is meant by low levels in the sediment and benthic organisms...(?) Be more specific i.e. levels less than 1 ppm (or whatever)
- p.23 - (first para.) October 1982(?)
- p.32-33 - more thorough explanation of "hot spot" and "fast track" approach are necessary